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Testimony
EPA's Proposed Rule
"Promulgation of Air Quality Implementation Plans; State of Texas; Regional Haze and Interstate Visibility Transport Federal Implementation Plan: Proposal of Best Available Retrofit Technology (BART) and Interstate Transport Provisions"
Docket Number EPA-R06-OAR-2016-0611

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My name is Liana James and I am a legal fellow with the Environmental Defense Fund, a non-partisan environmental organization with more than 1.5 million members nationwide. For decades, the Environmental Defense Fund has worked across the country, and in Texas, to protect human health and the environment from harmful air pollution.

First, I want to thank the EPA for its long, bipartisan history of cleaning up our air, water, and land – making communities safer and healthier across the United States. The EPA has historically taken important steps to ensure that our cherished National Parks and Wilderness Areas have awe-inspiring views, clean and healthy air, and continue to be powerful economic engines for surrounding communities.

EPA leadership over the past decade has resulted in visibility improvements at National Parks and Wilderness Areas across the country. Many of these improvements are directly related to the installation of Best Available Retrofit Technology (BART).

I am here today to call on the EPA to continue the tremendous leadership it has historically demonstrated on regional haze issues and to require source-specific SO2 and PM controls on eligible units in Texas, as it did in its January 2017 Proposed FIP.

Because my time is short, I will only briefly touch on the historic support for the Regional Haze Program as well as the health and economic importance of ensuring clean air in our nations National Parks and Wilderness Areas.

Starting with the Organic Act in 1916 creating the National Park Service, and expanded by the 1964 Wilderness Act and the 1977 Amendments to the Clean Air Act, Congress has recognized, with overwhelming bipartisan support, the need to protect and restore the scenic views of National Parks and Wilderness Areas, leaving them "unimpaired" for the enjoyment of future generations.

Effective implementation of the Regional Haze Program will also have collateral public health benefits by reducing human exposure to fine particulate matter. Fine particulate matter not only tarnishes scenic vistas, but also penetrates deep into people's lungs and can cause premature death, heart attacks, aggravated asthma, and other serious health problems.

The Texas Regional Haze FIP has very real health consequences for Texas citizens. In fact, the January 2017 proposed rule, which would have required source-specific SO2 and PM controls on eligible units in Texas, would have prevented tens of thousands of asthma attacks, 678 premature deaths, more than 100,000 lost or limited work days every year, and would have saved more than $6.7 billion in public health and lost productivity costs annually.[1]

Restoring air quality in National Parks and Wilderness Areas also has important economic benefits. According to the National Park Service, there were over almost 6 million visits to Texas's National Parks last year and those visitors spent over $300 million in surrounding communities. This spending supported over 4,000 jobs and increased overall economic output in the state by $428 million.[2]

Moreover, Texas has clean and affordable energy solutions close at hand that would create economic growth. Texas, which currently has the largest amount of installed wind capacity of any state, also has the capacity to generate over 5.5 million gigawatt hours of wind energy by 2050.[3] In 2016, Texas's wind energy industry supported up to 23,000 jobs.

Texas also has substantial solar energy potential. In 2017, the solar industry supported almost 9,000 jobs in Texas[4] and Texas A&M has launched the world's largest solar research and development facility to support Texas's growing solar industry.

In closing, I want to reiterate that the EPA should not finalize its proposed rule and should instead require source-specific SO2 and PM controls on eligible units in Texas. BART has a demonstrated track record of success and is the most appropriate implementation method for effectively addressing Texas's regional haze obligations.

Thank you again for the work you do to protect public health and the environment and for the opportunity to testify here today.

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[1] Report of George D. Thurston Regarding the Public Health Benefits of EPA's Proposed Rulemaking at 17-18 (May 4, 2017), Docket ID No. EPA-R06-OAR-2016-0611-0072. Available at: https://www.regulations.gov/document?D=EPA-R06-OAR-2016-0611-0072

[2] National Park Service, 2017 National Park Visitor Spending Effects Economic Contributions to Local Communities, States, and the Nation (April 2018). Available at: https://www.nps.gov/nature/customcf/NPS_Data_Visualization/docs/NPS_2017_Visitor_Spending_Effects.pdf

[3] U.S. Department of Energy's Office of Energy Efficiency & Renewable Energy, *Wind Energy in Texas.* Available at: https://windexchange.energy.gov/states/tx

[4] The Solar Foundation, *National Solar Jobs Census* (2017) Available at: https://www.thesolarfoundation.org/national/